

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP

Charles K. Verhoeven (Bar No. 170151)

2 charlesverhoeven@quinnemanuel.com

Melissa Baily (Bar No. 237649)

3 melissabaily@quinnemanuel.com

Lindsay Cooper (Bar No. 287125)

4 lindsaycooper@quinnemanuel.com

50 California Street, 22nd Floor

5 San Francisco, California 94111-4788

Telephone: (415) 875-6600

6 Facsimile: (415) 875-6700

7 Attorneys for GOOGLE LLC

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9 **UNITED STATES DISTRICT COURT**  
10 **NORTHERN DISTRICT OF CALIFORNIA**  
11 **SAN FRANCISCO DIVISION**

12  
13 GOOGLE LLC,

14 Plaintiff,

15 v.

16  
17 SONOS, INC.,

18 Defendant.

CASE NO. 3:20-cv-06754-WHA

Related to CASE NO. 3:21-cv-07559-WHA

**DECLARATION OF NIMA HEFAZI IN  
SUPPORT OF GOOGLE LLC'S REPLY IN  
SUPPORT OF ITS MOTION FOR LEAVE  
TO AMEND INVALIDITY  
CONTENTIONS PURSUANT TO PATENT  
L.R. 3-6**

1 I, Nima Hefazi, declare as follows and would so testify under oath if called upon to do so:

2 1. I am an attorney licensed to practice in the State of California and am admitted to  
3 practice before this Court. I am of counsel at Quinn Emanuel Urquhart & Sullivan LLP representing  
4 Google LLC (“Google”) in this matter. I make this declaration in support of Google’s Reply in  
5 Support of its Motion for Leave to Amend Invalidity Contentions Pursuant to Patent L.R. 3-6  
6 (“Reply”). If called as a witness, I could and would testify competently to the information contained  
7 herein.

8 2. Attached as Exhibit 1 is a true and correct copy of an excerpt of the Rebuttal Expert  
9 Report of Samrat Bhattacharjee Regarding Non-Infringement of Claim 13 of U.S. Patent No.  
10 9,967,615 and Other Issues.

11 I declare under penalty of perjury that the foregoing is true and correct to the best of my  
12 knowledge. Executed on September 20, 2022 in Los Angeles, California.

13  
14 DATED: September 20, 2022

Respectfully submitted,

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16 By /s/ Nima Hefazi  
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**ATTESTATION**

I, Charles K. Verhoeven, am the ECF user whose ID and password are being used to file the above Declaration. In compliance with Civil L.R. 5-1, I hereby attest that Nima Hefazi has concurred in the aforementioned filing.

DATED: September 20, 2022

/s/ Charles K. Verhoeven

Charles K. Verhoeven